

Atty. Docket No. YOR20010010US1
(590.043)

REMARKS

Applicants and the undersigned are most grateful for the time and effort accorded the instant application by the Examiner. It is respectfully noted that because the statutory date for this application falls on a weekend, this response filed on the first available business day after said weekend is appropriate. The Office is respectfully requested to reconsider the rejections presented in the outstanding Office Action in light of the following remarks.

Claims 1-17 were pending in the instant application at the time of the outstanding Office Action. Claims 1, 9, and 17 are independent claims; the remaining claims are dependent claims.

Claims 1-4, 9-12, and 17 stand rejected under 35 USC § 103(a) as being unpatentable over Flanagan et al. (hereinafter "Flanagan") in view of Wynn. Claims 5 and 13 stand rejected under 35 USC 21 103(a) as being unpatentable over Flanagan in view of Wynn and further in view of Beirle. Claims 6 and 14 stand rejected under 35 USC § 103(a) as being unpatentable over Flanagan in view of Wynn, Beirle and further in view of Sonmez et al. (hereinafter "Sonmez"). Claims 7 and 15 stand rejected under 35 USC § 103(a) as being unpatentable over in view of Wynn, Beirle, Sonmez and further in view of Ammar et al. (hereinafter "Ammar"). Reconsideration and withdrawal of the present rejections is hereby respectfully requested.

As best understood, Flanagan appears to be directed to a speech recognition system for use in an environment where the speaker is at a distance from the sound

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pickup device. (Col. 1, lines 14-17) In particular, Flanagan appears to transform distant speech (speech recorded with a distant mic) into close-talk speech (speech recorded with a close mic) using a neural network. The training of the neural network uses two recording: speech from the same source recorded by a far away mic and a close mic. Thus, Flanagan is utilizing and training signals from two distinct channels, even though the two signals may not necessarily be different or dissimilar. As asserted in the Outstanding Office Action, Flanagan fails to teach reconciling an initial speech signal and at least one interfering signal with another to produce a final speech signal in real-time.

Wynn fails to overcome the deficiencies of Flanagan as shown above. As best understood, Wynn is an enhancement process for filtering in-channel speech-plus-noise. Wynn specifically teaches away from combination with Flanagan, asserting that it is utilized "when no separate noise reference is available" (column 3, lines 25-28). It is clear that Flanagan is based upon the utilization of two signals and two channels, one obtained from speech record with a close mic, and one obtained from speech recorded with a distant mic. This basis necessary involves a channel of speech and another separate noise (speech) reference. Consequently, the combination of Flanagan with Wynn is invalid, because Wynn specifically asserts that it is utilized when no separate noise reference is available. The independent claims have been shown to be patentable over Flanagan; because the combination of Wynn and Flanagan is invalid, the independent claims are thus presented as being patentable over the prior art and in condition for allowance.

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A 35 U.S.C. 103(a) rejection requires that the combined cited references provide both the motivation to combine the references and an expectation of success. Not only is there no motivation to combine the references, no expectation of success, but actually combining the references would not produce the claimed invention.

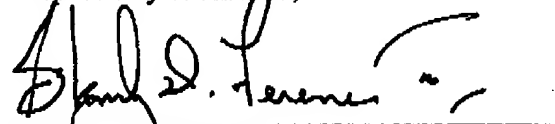
As shown above, the combination of Flanagan and Wynn is not a valid combination, because Wynn teaches away from combination with Flanagan. Further, it should be noted that even if another prior art reference has real-time capability, its combination with Flanagan would not meet the limitations of implementation in real-time as in the instant invention. Because Flanagan does not run in real-time, any combination of Flanagan with another reference will NOT have real-time implementation because the combination will be slowed by Flanagan. Thus, none of the references cited in the outstanding Office Action, in combination with Flanagan, meet the limitation of the independent claims. Correspondingly, none of these references in combination with Flanagan meet the limitations of the dependent claims that they allegedly reject under 35 USC § 103(a). Thus, the claimed invention is patentable over the combined references and the state of the art.

By virtue of dependence from what are believed to be allowable independent Claims 1 and 9, it is respectfully submitted that Claims 2-8 and 10-16 are also presently allowable. Applicants acknowledge that Claims 8 and 16 were indicated by the Examiner as being allowable if rewritten in independent form. Applicants reserve the right to file new claims of such scope at a later date that would still, at that point, presumably be allowable.

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In summary, it is respectfully submitted that the instant application, including Claims 1-17, is presently in condition for allowance. Notice to the effect is hereby earnestly solicited. If there are any further issues in this application, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



Stanley D. Ference III
Registration No. 33,879

Customer No. 35195
FERENCE & ASSOCIATES
409 Broad Street
Pittsburgh, Pennsylvania 15143
(412) 741-8400
(412) 741-9292 - Facsimile

Attorneys for Applicants